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Via ECFS

November 28, 2005

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: SAVVIS, Inc. Compliance Letter in WC Docket Nos. 05-196 and 04-36

Dear Ms. Dortch:

SAVVIS, Inc. (SAVVIS) hereby submits the following Compliance Letter, in accordance with the rules adopted in the FCC's June 3, 2005 *First Report and Order* (the "VoIP 911 Order") and Public Notice, DA 05-2945 (released November 7, 2005), issued in the above-referenced dockets. Under an agreement with AccessLine Communications Corporation (ACC), SAVVIS' partner in providing interconnected voice over Internet protocol services (VoIP), SAVVIS provides interconnected VoIP services as an application layer service to existing enterprise customers that purchase dedicated Internet access. Under contract with ACC, Intrado Inc. (Intrado) is providing the nationwide E911 solution for SAVVIS' customers. The service is provided through an existing PBX owned and configured by the enterprise customer, using standard telephone handsets. The phones cannot be operated away from the business to provide a nomadic service. SAVVIS does not provide interconnected VoIP service to residential customers.

In response to the Commission's VoIP 911 Order and related public notices, SAVVIS has taken the following actions:

- 1) Notified all customers in writing of limitations in SAVVIS' 911 services, including that E911 service may not be available in certain circumstances;
- 2) Provided warning labels to customers highlighting the limitations;
- 3) Received signed acknowledgements of the receipt of such 911 limitations from each customer;
- 4) Maintained a record of all such acknowledgements received; and
- 5) Confirmed the Registered Location of all customers and implemented a system whereby customers can update their registered location.

Based on the most current information provided by Intrado, SAVVIS (through ACC and Intrado) will be interconnected, directly or indirectly, to approximately 154 E911 Selective Routers by November 28, 2005. Intrado has provided the attached Major Market Deployment Map (in PDF) and VoIP Deployment Plan (in Excel format), which reflect Intrado's current major market deployment schedule where it has connectivity to at least one Selective Router, ALI (Automatic Location Identification) steering and the ability to populate an ALI database.

As of the date of this letter, SAVVIS cannot provide a 911 service in compliance with the VoIP 911 Order to any of its interconnected VoIP customers, as none of these customers are located in areas where the Intrado E911 capability is currently fully deployed. Based on the Intrado deployment schedule and estimates from ACC, SAVVIS expects that it will be able to provide a 911 service in compliance with the VoIP 911 Order to 100 percent of its existing customers by no later than March 31, 2006.

When the Intrado solution is fully employed in the market, SAVVIS will be capable of transmitting all 911 calls to the appropriate PSAP utilizing the Selective Router. This is typically accomplished by routing 911 calls through an Emergency Services Gateway (ESGW) which Intrado has interconnected with the Selective Router. The following describes the 911 call process:

- a. SAVVIS sends a data message to Intrado providing the Telephone Number (TN) of the calling party.
- b. Intrado locates the TN in an Intrado internal database corresponding to a pre-registered SAVVIS customer.
- c. Intrado sends a reply message to SAVVIS providing an Emergency Services Query Key (ESQK) and Emergency Services Routing Number (ESRN) for the call.
- d. SAVVIS routes the 911 call to an Intrado "Peering Point" gateway via a dedicated ISDN trunk group, providing the ESRN and ESQK with the call.
- e. Intrado uses the ESRN to determine which Selective Router the call should be routed to, and routes the call to an ESGW connected to that Selective Router, passing along the ESQK.
- f. The Selective Router routes the call to the correct Public Safety Answering Point (PSAP), and the PSAP queries the ALI database using the ESQK.
- g. The ALI database finds an entry in the ALI steering table corresponding to the ESQK, and then queries the Intrado internal database using the ESQK.
- h. The Intrado internal database finds the customer record corresponding to the ESQK, and replies to the PSAP with the customer's actual Telephone Number (TN) and Master Street Address Guide (MSAG)-valid address.

Where the Intrado E911 solution has been fully deployed, the transmission of 911 calls includes the callers Automatic Number Identification (ANI) and MSAG-valid location to all PSAPs capable of receiving and processing such information. Intrado estimates that 93% of the populations is served by PSAPs operating off of an E911 Selective Router, and are capable of receiving and processing the ALI information Intrado transmits. None of SAVVIS' current interconnected VoIP customers are located in areas where the Intrado E911 solution is fully deployed. Therefore, no SAVVIS subscribers are having ANI and MSAG-valid location information transmitted to PSAPs that are capable of receiving such information.

For those SAVVIS customers located in areas where the Intrado E911 solution is not yet fully deployed, Intrado is providing a 911 solution that routes calls to the 10-digit "administrative" number of the PSAP that corresponds to the customer's pre-registered location. In certain cases, the customer may choose to maintain a PSTN connection provided by the local exchange carrier (LEC) for routing of 911 calls. In such cases, the customer configures its PBX to route 911 calls directly to their LEC and not to the SAVVIS VoIP gateway. In these situations, the 911 call is handled as a traditional wireline call by the LEC and is not an interconnected VoIP call.

In those areas where Intrado is not interconnected with the Selective Router, SAVVIS will not market or sell interconnected VoIP service to new customers. SAVVIS will, however, provide service to existing



customers in the manner noted above; and those customers will be automatically transitioned to Intrado's E911 service as soon as it becomes available in that customer's location.


As of the compliance dates in the VoIP 911 Order and subsequent Public Notices, SAVVIS notified its existing customers of the 911 limitations related to their VoIP service, and distributed appropriate warning labels. All customers returned their signed acknowledgement of these limitations and SAVVIS is maintaining a record of these acknowledgements. The VoIP service for these existing customers includes only on-net and long distance voice service. For these customers, SAVVIS is not the local exchange service provider and the customer maintains a PSTN connection from a LEC for routing both local and 911 calls. In an excess of caution, however, SAVVIS did notify these customers of the 911 limitations as described above.

Subsequent to the FCC's VoIP 911 Order, SAVVIS added a local calling capability to its VoIP service product offering for enterprise customers. As part of its contract process for every customer purchasing this new service, and as required by the FCC, SAVVIS provides customers with notification of the 911 limitations. This contract process requires customer's signature, resulting in acknowledgement from 100% of all customers. SAVVIS maintains a copy of these customer acknowledgements and distributes appropriate VoIP 911 warning labels. For any customers using the new local calling VoIP service, SAVVIS confirms the Registered Location with the customer for all service locations in writing or in electronic form as part of SAVVIS' order fulfillment process.

Subscribers are required to notify SAVVIS if they move from their Registered Location. In the case of a SAVVIS customer, this would mean the relocation of the customer's PBX, because the phones themselves will not work unless they are operated through a PBX.<sup>1</sup> Subscribers may notify SAVVIS of any PBX relocation by contacting SAVVIS customer service via phone, e-mail, or in writing. This includes the ability to contact SAVVIS customer service for this purpose via a phone call from the customer's PBX connected to the SAVVIS VoIP gateway.

Please direct any questions concerning this filing to the undersigned.

Sincerely yours,



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#### Attachments

cc: Kathy Berthot, Enforcement Bureau (by e-mail)  
Janice Myles, Wireline Competition Bureau (by e-mail)  
Best Copy and Printing, Inc. (by e-mail)

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<sup>1</sup> As a result, SAVVIS has not implemented a technical solution for nomadic service.